

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**In re: ROBINSON, JANICE**  
Debtor

**Case No.: 22-10414**  
Chapter 13

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**MOTION AND NOTICE TO MODIFY CHAPTER 13 PLAN**

COMES NOW the Debtor, Janice Robinson, by and through the undersigned counsel, and files this Motion to Modify her Chapter 13 Plan, and in support thereof would respectfully show unto the Court as follows:

1. Debtor filed a Voluntary Petition for bankruptcy relief under Chapter 13 on March 1, 2022. The Chapter 13 Plan was confirmed on April 20, 2022.
2. The Confirmed Plan is for 36 months.
3. Since confirmation of the Chapter 13 Plan, the Debtor has received the proof of claim for her mortgage which came in higher than scheduled and requests that the Court extend the Chapter 13 Plan by an additional (12) months so that it is a 48 month plan.
4. Debtor requests that the Trustee amend the plan as needed so that it completes in 48 months.
5. Debtor's currently have thirty (30) months left in their plan, but if the Motion to Modify is granted would have forty two (42) months left.

WHEREFORE, PREMISES CONSIDERED, the Debtor prays that this honorable Court would allow them to extend the Chapter 13 Plan by twelve (12) months and allow the Trustee to adjust future payments accordingly.

On this, the 9<sup>th</sup> day of September 2022.

RESPECTFULLY SUBMITTED,

/s/ Catherine Umberger

Catherine Umberger, ESQ.

P.O. Box 9

Tupelo, MS 38802

MS Bar No. 104458

**NOTICE TO ALL CREDITORS YOU HAVE 30 DAYS TO OBJECT TO THE MOTION TO MODIFY PLAN BY FILING AN OBJECTION WITH THE BANKRUPTCY COURT AT: UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF MS, 703 HWY 145 N., ABERDEEN, MS 39730**

**Objection Deadline: October 11, 2022**

**CERTIFICATE OF SERVICE**

I, Catherine Umberger, the undersigned counsel, do hereby certify that I have on this day caused to be mailed a true and correct copy of the foregoing Motion to Modify Chapter 13 Plan, via electronic and/or U.S. Mail, postage prepaid, to the following:

- U.S. Trustee [USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)
- Terre Vardaman
- See attached list of creditors

DATED: September 9, 2022

/s/ Catherine Umberger  
CATHERINE UMBERGER, ESQ

**Adam Pulaski**  
2925 Richmond Ave Ste 1725  
Houston, TX 77098-3136

**Amerimark**  
c/o Creditors Bankruptcy Service  
PO Box 800849  
Dallas, TX 75380-0849

**Capital Bank/Resurgent Capital Services**  
PO Box 10368  
Greenville, SC 29603-0368

**Columbus Fence Company LLC**

5356 Highway 182 E  
Columbus, MS 39702-8442

**Comcast**

1701 John F Kennedy Blvd  
Philadelphia, PA 19103-2838

**Diversified Consultants**

PO Box 551268  
Jacksonville, FL 32255-1268

**Fed Loan Servicing**

PO Box 60610  
Harrisburg, PA 17106-0610

**Franklin Collection Service**

2978 W Jackson St  
Tupelo, MS 38801-6731

**Internal Revenue Service**

PO Box 7346  
Philadelphia, PA 19101-7346

**Internal Revenue Service**

Attn: Special Processing Staff  
100 West Capitol Street  
Room 504  
Jackson MS 39269

**Jeffrey Lowe**

8235 Forsyth Blvd Bldg STE 1100  
Saint Louis, MO 63105-1606

**Lowndes Justice Court**

309 Martin Luther King Jr Dr S  
Columbus, MS 39701-6206

**Mississippi Department of Revenue**

Bankruptcy Section  
Post Office Box 22808  
Jackson MS 39225-2808

**OCH Huxford Clinic**

PO Box 1326  
Starkville, MS 39760-1326

**Oktibbeha County Hospital**

400 Hospital Rd  
Starkville, MS 39759-2163

**Rural Housing and Development**

In care of U. S. Attorney  
900 Jefferson Avenue  
Oxford MS 38655

**Selfinc/lead**

Attn: Bankruptcy  
515 Congress Ave Ste 2200  
Austin, TX 78701-3560

**Stoneberry**

c/o Creditors Bankruptcy Service  
P.O. Box 800849  
Dallas, TX 75380

**Tower Loan of Mississippi, LLC**

PO Box 320001  
Flowood, MS 39232-0001

**Tower Loan of Mississippi, LLC**

P.O. Box 320001  
Flowood, MS 39232

**U. S. Department of Education**

In care of U. S. Attorney  
900 Jefferson Avenue  
Oxford MS 38655

**U.S. Department of Housing and Urban Development**

c/o Novad Management Consulting, LLC  
2401 N.W. 23rd Street, Suite 1A1  
Oklahoma City OK 73107

**United States Department of Education**

Claims Filing Unit  
PO Box 8973  
Madison, WI 53708

**United States Department of Education**

Claims Filing Unit  
PO Box 8973  
Madison, WI 53708-8973

**US Attorney**

900 Jefferson Ave  
Oxford, MS 38655-3608

**US Department of Education**

PO Box 16448

St. Paul, MN 55116-0448

**US Department of Education ECMC**

Attn: Bankruptcy

PO Box 16408

Saint Paul, MN 55116-0408

**USDA-Rural Housing Service**

Centralized Servicing Center

PO Box 66879

Saint Louis, MO 63166-6879

**USDOE/GLELSI**

Attn: Bankruptcy

PO Box 7860

Madison, WI 53707-7860

**Verizon Wireless**

PO Box 650051

Dallas, TX 75265-0051

**Vernon Medical Clinic**

c/o Franklin Collection Service

PO Box 3910

Tupelo, MS 38803-3910